Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Emergency Connectivity Fund to Address the Homework Gap	WC Docket No. 21-93

REPLY COMMENTS OF THE MASSACHUSETTS EDUCATIONAL TECHNOLOGY ADMINISTRATORS ASSOCIATION

The Massachusetts Educational Technology Administrators Association (METAA) respectfully submits these Reply Comments urging the Federal Communications Commission ("FCC") to craft rules for administering the Emergency Connectivity Fund ("ECF") that recognize and defer, whenever possible, to the expert judgment of school district technology leaders about how to maximize the program's impact on the broadband and device connectivity gaps facing students and staff. Given the large number of pandemic challenges that school district leaders are working to address, the ECF must be designed to efficiently deliver these connectivity resources to every corner of our state.

METAA serves preschool, elementary, and secondary school educational technology administrators working across Massachusetts. Our members serve students and staff at public, private, independent, charter, and parochial schools. They are responsible for ensuring that students and school staff have access to the broadband connectivity and technology required for teaching and learning. This work includes serving as the local leaders responsible for applying for and using the FCC's Universal Service Fund Schools and Libraries Program ("E-rate") to ensure that all Massachusetts' students have access to high-capacity broadband connections at school. Given these responsibilities, our members are deeply knowledgeable about the connectivity and technology challenges facing schools. They are also well versed in the E-rate's processes and procedures.

METAA strongly endorses the initial comments filed in this proceeding that urge the FCC to: (1) distribute program funds using a budget cap model that provides districts with a predictable, easily administrable, and transparent support mechanism; (2) provide districts with maximum flexible to meet their students' and educators' broadband and device needs; and (3) recognizes video's central role in remote learning and the associated upload and download speeds that it requires.

THE FCC SHOULD ADOPT LESSONS FROM THE E-RATE PROGRAM, INCLUDING USING THE SUCCESSFUL E-RATE CATEGORY 2 FRAMEWORK AS A MODEL OF A PREDICTABLE, EASILY ADMINISTRABLE, AND TRANSPARENT FUNDING DISTRIBUTION PROCESS

The nearly 25-year implementation of the E-rate program provides important lessons for administration of the ECF. The program's incredible success in connecting nearly all schools to broadband provides a road map for the ECF, including approaches that should be avoided. The complexity of E-rate Category One's application process has discouraged many school districts from participating and has been especially harmful to small and lower income communities that may not be able to hire expert assistance with the application process. Lower student home connectivity rates correlate with these same lower income and rural areas. Therefore, the FCC should adopt a distribution approach for the ECF that makes it easy for all districts to take advantage of the program's funding, while also honoring the unquestioned need to focus funding on the highest need schools, students, and staff. METAA agrees with the ACSA-CSBA Federal Partnership's Comments that a budget cap system is the best approach and "…that such a system must provide significantly more ECF resources to the applicants serving the lowest income and most rural communities."

With that goal as our guide, METAA strongly support the Consortium for School Networking's Comments - and the similar filings of other groups that represent state and local education technology experts - calling for the agency to use a budget caps approach for distributing the ECF's limited funding. This proven model will greatly simplify the application process and provide the predictable, transparent, and flexible approach that school districts – and the public – need in order for this program to be successful and accountable. We agree with the

State Educational Technology Directors Association's (SETDA) Comments stating that a caps model "…lends itself to a less burdensome and less time-consuming application process." Massachusetts district leaders' capacity is already stretched to the breaking point by the pandemic and adding a complicated and time consuming ECH application to their many responsibilities would not be wise.

A budget caps approach is wholly consistent with the statute's direction that the FCC should reimburse 100% of the costs associated with eligible equipment and services. Given that $7.1 billion is not sufficient – based on credible recent estimates - to meet the connectivity needs of every student and teacher in the country, Congress's directive could only mean that ECF recipients are not required to provide matching funds for the eligible services and equipment acquired using the limited available funds. A per student approach that provides a 100% discount up to predetermined level is aligned with the statute's intent and is the best way to ensure that every district has a chance to use this limited funding to meet the needs of their low income and other students affected by the pandemic.

THE FCC SHOULD PROVIDE DISTRICTS WITH MAXIMUM FLEXIBLE TO MEET THEIR STUDENTS' AND EDUCATORS' BROADBAND AND DEVICE NEEDS

METAA agrees with Common Sense's Comment urging the "…Commission to allow schools and libraries the greatest flexibility possible to use these funds to ensure robust access for students and teachers to distance learning throughout the duration of this public health emergency." Massachusetts's school districts are well positioned to identify the services and technologies that will best meet the unique connectivity needs of their students and educators. The ECF's implementing regulations must empower recipients to make local decisions about how to meet their students' and educators' connectivity needs. This deference to local decision making should include the authority to deploy network facilities when they are the most cost-effective way close local connectivity gaps. METAA's members are using a variety of innovative strategies to deliver remote learning and they would be able to expand those innovations if they had access to appropriately flexible funding.

This flexibility should extend to the ability of applicants to serve students wherever they may live in the community. Many students live in more than one residence as a result of being part of split families. Others live in temporary housing and shelters. Thus, we agree with SETDA's Comments that "[t]he Commission should not limit the locations that could receive ECF supported wireline and fixed wireless services. Students in homeless shelters and other temporary locations, for example, must be provided connectivity just like a student in a longer-term home." Reaching these high need students will require innovations which depend on regulatory flexibility and deference to local, reasonable judgments.

THE FCC SHOULD ADOPT 25 MBPS/STUDENT DOWNLOAD AND 12 MBPS/STUDENT UPLOAD AS THE ECF'S MINIMUM CONNECTIVITY GOAL, WHILE PROVIDING EXCEPTIONS FOR PLACES THAT CURRENTLY LACK THE INFRASTRUCTURE TO MEET IT

Massachusetts's students, like learners across the country, have relied primarily on video for learning during the pandemic. Video not only supports direct instruction, but also collaboration among students and between students and teachers. Video requires higher connectivity speeds than the FCC's proposed broadband definition envisions. Video also requires modern routers and sufficiently powered devices, so the FCC should only encourage ECF spending on equipment that meets students' and educators' real life remote learning requirements.

In light of this need, METAA strongly supports the comments filed by the Consortium for School Networking that encourage a focus on ensuring that the ECH encourages 25 Mbps download and 12 Mbps speeds per student. This per student approach is essential given that many Massachusetts's households include more than one student and often also include parents working from home during the pandemic. CoSN's comments also accurately point out the importance of ensuring that the ECF drives households to acquire modern routers and computers of sufficient power to support remote learning. Given students' and educators video needs, the ECF implementing regulations should also require participating internet service providers to deliver unlimited data for home connections without throttling.

CONCLUSION

Thank you for carefully considering METAA's recommendations. We are grateful for Congress's decision to provide these dedicated connectivity funds to the nation's students and look forward to working with the FCC to make the program a success.

Submitted by,

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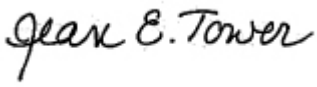

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